



# City of Chattanooga

Mayor Andy Berke

October 25, 2017

VIA CERTIFIED MAIL

Ms. Sara Janovitz  
Environmental Engineer  
Clean Water Enforcement Branch  
US EPA-Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303

**Re: *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245*  
Quarterly Report No. 17 – July 2017 to September 2017**

Dear Ms. Janovitz:

On behalf of the City of Chattanooga, Tennessee ("City"), and in accordance with the consent decree entered by the United States District Court for the Eastern District of Tennessee (Southern Division), on April 24, 2013, in the case styled the United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245 ("Consent Decree"), we are submitting to both the Environmental Protection Agency ("EPA") and the Tennessee Department of Environment and Conservation ("TDEC") the seventeenth quarterly report required pursuant to paragraph 38 of the Consent Decree. This report is also being submitted in accordance with the letter from Denise Diaz, dated September 16, 2013, establishing the dates for reporting under the Consent Decree.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Ms. Sara Janovitz  
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Please let me know if you have any questions regarding our submittal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Patrick".

Michael Patrick, P.E.  
Director, Waste Resources Division

Enclosure

cc: Karl Fingerhood, Esq., US DOJ  
Chief, Environmental Enforcement Section, US DOJ  
Chief, Clean Water Enforcement Branch, US EPA Region 4  
Bill Bush, Esq., US EPA  
Sohnia Hong, Office of the Attorney General  
Enforcement Coordinator, Water Pollution Control, TDEC  
Shelby Ward, TN Clean Water Network  
Adam Sowatzka, Esq., King & Spalding  
Mike Marino, P.E., Jacobs Engineering



# Quarterly Report No. 17

**July 1, 2017 – September 30, 2017**

*Prepared for*

**United States Environmental Protection Agency  
and Tennessee Department of Environment and  
Conservation**

City of Chattanooga  
Waste Resources Division  
Consent Decree Program  
Case No. 1:12-cv-00245

*Prepared by*

**City of Chattanooga**  
Waste Resources Division

*Submitted by*

**JACOBS®**

Jacobs Engineering Group Inc.  
Consent Decree Program Manager

Chattanooga, Tennessee

October 25, 2017



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# Acronyms and Abbreviations

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Ave	Avenue
CD	Consent Decree
CFR	Code of Federal Regulations
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
Dr	Drive
EPA	Environmental Protection Agency
Gal	Gallons
Hrs	Hours
Hwy	Highway
Ln	Lane
MBWWTP	Moccasin Bend Waste Water Treatment Plant
MG	Million Gallons
MH	Manhole
N/A	Not Applicable
No.	Number
NPDES	National Pollutant Discharge Elimination System
PS	Pump Station
Rd	Road
SSO	Sanitary Sewer Overflow
St	Street
TDEC	Tennessee Department of Environment and Conservation
Trl	Trail
UNK	Unknown
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

# 1.0 Introduction

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## 1.1 Purpose

The City of Chattanooga entered into a consent decree with the United States and the State of Tennessee in the case styled *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245* (“CD”), which became effective on April 24, 2013. Pursuant to Section IX, paragraph 38 of the CD, Chattanooga is required to submit reports on a quarterly basis to the Environmental Protection Agency (“EPA”) and Tennessee Department of Environment and Conservation (“TDEC”). Chattanooga has prepared Quarterly Report No.17 to satisfy the reporting requirements of the CD. This report is also being submitted in accordance with the letter from Denise Diaz, dated September 16, 2013, establishing the dates for reporting under the CD.

## 1.2 Requirements

As detailed in Section IX, paragraph 38 of the CD, Chattanooga is required to report the date, time, location, source, estimated duration and volume, and receiving water of the following events:

1. Sanitary sewer overflow (“SSO”) events occurring during the reporting period;
2. Combined sewer overflow (“CSO”) outfall discharges occurring during the reporting period;  
and
3. Bypasses at the Moccasin Bend Wastewater Treatment Plant (“MBWWTP”) occurring during the reporting period.

This information is provided in tabular form in Sections 2.0 – 4.0 of this report.



## 2.0 SSO Events

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For the reporting period of July 1, 2017 through September 30, 2017, Chattanooga experienced the SSOs listed in Table 2-1. An SSO event is defined in paragraph 8.(nn) of the CD as “any discharge of wastewater to waters of the United States or State from Chattanooga’s Sewer System through a point source not permitted in any National Pollutant Discharge Elimination System (“NPDES”) permit, as well as any overflow, spill, or release of wastewater to public or private property from the Sewer System that may not have reached waters of the United States or the State, including all building backups.”

**Table 2-1**  
**Quarterly SSO Report**

SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
1 <sup>1</sup>	02-Jul-17	2:45 PM	1908 Wisteria Dr	Manhole	S111B028	0.25	750	Tennessee River	Pump Station - Mechanical Failure
2 <sup>1</sup>	05-Jul-17	8:15 PM	6695 Hickory Brook Dr	Manhole	S138M082	14.25	149,625	Storm Drain	Wet Weather
3	06-Jul-17	11:07 AM	1033 Lupton Dr	Manhole	S118K036	3.40	10,550	Tennessee River	Wet Weather
4	07-Jul-17	9:00 AM	6402 Shallowford Rd	Manhole	S138N068	1.75	1,575	Storm Drain	Blockage - Grease
5	10-Jul-17	10:38 AM	1106 Fernway Circle	Main Line	N/A	2.37	5,992	Land*	Break
6	31-Jul-17	12:25 PM	5816 Lake Resort Dr (Big Ridge #1)	Main Line	N/A	1.58	475	Land*	Defect(s)
7	02-Aug-17	10:00 AM	1100 Lupton Dr	Force Main	S118L016	3.00	1,122	Tennessee River	Defect(s)
8 <sup>1</sup>	11-Aug-17	9:15 AM	6695 Hickory Brook Dr	Manhole	S138M082	3.75	22,500	Storm Drain	Wet Weather
9	12-Sep-17	1:15 AM	1 Frawley Rd	Manhole	Unassigned	7.50	67,500	South Chickamauga Creek	Wet Weather

<sup>1</sup> Common Cause, within 500 yards of separate event

\* Did not reach waters of the United States.

## 3.0 Moccasin Bend WWTP Bypasses

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The CD sets forth the same definition for bypass as the EPA's regulations at 40 C.F.R. § 122.41(m), which defines a bypass as the intentional diversion of waste streams from any portion of a treatment facility. The City's current NPDES permit defines a bypass as the intentional diversion of wastewater away from any portion of a treatment facility other than through peak excess flow treatment facilities or permitted outfalls in accordance with both the long-term control plan and the nine minimum technology-based effluent controls for combined sewer systems. The City reports bypasses and wet weather discharges separately on the monthly Discharge Monitoring Reports, as a discharge from the City's permitted wet weather discharge is not a bypass under the City's current NPDES permit. Based on the foregoing, the WWTP experienced no bypasses during the reporting period of July 1, 2017 through September 30, 2017.



## 4.0 CSO Outfall Discharges

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For the reporting period of July 1, 2017 through September 30, 2017 Chattanooga experienced CSO discharges from CSO outfall treatment facilities as listed in Table 4-1. Paragraph 8.(h) of the CD defines a CSO as “any discharge from the CSS from any outfall currently identified, or identified in the future, as a permitted combined sewer overflow outfall in any Chattanooga NPDES permit from which CSOs are discharged to waters of the United States or the State.” The CSS is defined as the portion of Chattanooga’s wastewater collection and transmission system (“WCTS”) designed to convey municipal sewage (domestic, commercial and industrial wastewaters) and storm water runoff through a single-pipe system to Chattanooga’s WWTP or CSO outfalls. Chattanooga operates eight (8) permitted CSO outfall treatment facilities, seven (7) of which discharged during the reporting period.

**Table 4-1**  
**Quarterly CSO Outfall Discharge Report**

July 1, 2017 – September 30, 2017						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
1-July thru 2-July	12:00 AM	Central Ave. CSO (002)	23.48	3.960667	Tennessee River	Rain Event
1-Jul-17	4:54 PM	Citico CSO (004)	0.98	0.021328	Tennessee River	Rain Event
1-Jul-17	4:45 PM	ML King CSO (007)	1.57	0.198568	Tennessee River	Rain Event
1-Jul-17	4:24 PM	19th St. CSO (008)	0.70	0.076050	Tennessee River	Rain Event
1-Jul-17	9:50 PM	Carter St. CSO (009)	0.90	0.321105	Tennessee River	Rain Event
3-Jul-17	6:38 PM	Central Ave. CSO (002)	1.52	0.077870	Tennessee River	Rain Event
4-July thru 7-July	7:34 AM	Central Ave. CSO (002)	78.08	13.650921	Tennessee River	Rain Event
4-Jul-17	9:05 AM	Citico CSO (004)	0.25	0.006550	Tennessee River	Rain Event
4-Jul-17	8:55 AM	ML King CSO (007)	2.70	0.295501	Tennessee River	Rain Event
4-Jul-17	6:31 AM	19th St. CSO (008)	2.22	0.169520	Tennessee River	Rain Event
4-Jul-17	9:00 AM	Carter St. CSO (009)	2.92	1.578421	Tennessee River	Rain Event
5-Jul-17	3:55 PM	Citico CSO (004)	1.43	0.742749	Tennessee River	Rain Event
5-Jul-17	3:52 PM	ML King CSO (007)	1.87	0.163699	Tennessee River	Rain Event
5-Jul-17	3:44 PM	19th St. CSO (008)	0.40	0.059241	Tennessee River	Rain Event
5-Jul-17	3:44 PM	Carter St. CSO (009)	1.35	0.354291	Tennessee River	Rain Event
14-Jul-17	11:18 PM	Ross's Landing CSO (006)	0.68	1.114174	Tennessee River	Rain Event
14-Jul-17	11:08 PM	ML King CSO (007)	0.83	0.549293	Tennessee River	Rain Event
14-July thru 15-July	11:04 PM	Carter St. CSO (009)	2.23	2.465875	Tennessee River	Rain Event
15-Jul-17	12:24 AM	19th St. CSO (008)	0.12	0.005367	Tennessee River	Rain Event
17-Jul-17	3:20 PM	ML King CSO (007)	0.52	0.011546	Tennessee River	Rain Event

**Table 4-1**  
**Quarterly CSO Outfall Discharge Report**

July 1, 2017 – September 30, 2017						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
11-Aug-17	1:31 AM	Tremont CSO (005)	0.43	0.136843	Tennessee River	Rain Event
5-Sept thru 6-Sept	9:06 PM	Central Ave. CSO (002)	14.08	0.496940	Tennessee River	Rain Event
5-Sep-17	9:38 PM	19th St. CSO (008)	0.12	0.012628	Tennessee River	Rain Event
11-Sept thru 12-Sept	8:24 PM	19th St. CSO (008)	0.87	0.406957	Tennessee River	Rain Event
11-Sep-17	9:36 PM	ML King CSO (007)	4.00	0.685361	Tennessee River	Rain Event
11-Sept thru 13-Sept	9:48 PM	Central Ave. CSO (002)	33.55	8.632164	Tennessee River	Rain Event